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Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RECALL TED WHEELER, JOHN
SCHROEDER, and MADELINE KAY,

Plaintiff,

v.

MARY HULL CABALLERO, Portland City
Auditor, and LOUISE HANSEN, Elections
Officer,

Defendants.

Case No. 3:21-cv-01448-MO

MOTION FOR EXTENSION OF TIME

(UNOPPOSED)

LR 7-1 CERTIFICATE

Plaintiff's counsel certifies that he conferred via email with Counsel for Defendants, Naomi Sheffield, regarding the relief sought in this motion. Defendants do not oppose the relief sought in this motion.

RELIEF REQUESTED

Plaintiffs request an extension of 3 days from today's date to file a Joint Status Report in this matter. This motion is supported by the Declaration of Counsel incorporated here by reference.

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon showings of "good cause." Fed. R. Civ. P. 16(b)(4). Here, there is good cause for because Plaintiffs require the weekend to meet and confer about scheduling and next steps in this matter. Plaintiffs anticipate being able to conclude their consideration, and confer with the City, by Monday, November 1, 2021.

CONCLUSION

Based on the foregoing, the case schedule should be amended to allow the Parties to submit their Joint Status Report to the Court by November 1, 2021.

DATED, October 29, 2021.

/s/ Juan C. Chavez
Juan C. Chavez
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Attorney for Plaintiff